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August 30, 2021

Hon. Denise L. Cote  
United State District Court  
Southern District of New York  
500 Pearl Street, Room 1910  
New York, NY 10007

VIA: Pro Se Intake Unit of the United States District Court for the Southern District of New York;  
[Temporary\\_pro\\_se\\_filing@nysd.uscourts.gov](mailto:Temporary_pro_se_filing@nysd.uscourts.gov)

Re: Integrated Media Resources, LLC v. Morley et al, Docket No. 1:21-cv-04993

Dear Judge Cote:

I am a Pro Se Defendant in the above-referenced action. I write to respectfully request an extension of the time for me to file a Motion to Dismiss Complaint as to Pro Se Defendant Karjian. In the alternative, I respectfully request that the Court grant me dispensation, through this Letter Motion, to join and incorporate by reference the arguments made by (1) nominal defendants G2 FMV, LLC (“G2 FMV”) and G2 Investment Group, LLC (“G2 IG”) and Defendant Jonathan Todd Morley in their Memorandum of Law in support of the Motion to Dismiss, by their counsel Schulte Roth & Zabel LLP (the “G2 and Morley Memorandum”) and (2) Defendants David Sams, Jonathan Lerman and Maria Boyazny in their Memorandum of Law in support of Motion to Dismiss Complaint (the “Remaining Defendants’ Memorandum”).

Although I did file a Notice of Appearance and Answer to Complaint today, August 30, 2021, the Answer included numerous affirmative defenses which, I understand would properly require an accompanying motion to dismiss, including an appropriate memorandum of law setting forth the legal basis for my motion. I note that my affirmative defenses are the same as those set forth by the other defendants.

I served notice on the G2 Defendants today that they are obligated to indemnify me and advance costs, which would enable me to be represented by counsel that could properly draft and submit a memorandum of law in support of a motion to dismiss. I have requested that they confirm this obligation and act accordingly by September 2, 2021. Additionally, I have sought the assistance of the Pro Se Intake Unit of the United States District Court for the Southern District of New York and am scheduled for an initial meeting with them on September 2, 2021. Given the

complexity of this matter (as evidenced by the motions submitted by the other defendants), I believe it is fair to allow me to find or use similar resources as the other defendants to enable me to draft and submit motions before the Court in support of my defense. My primary two methods to this end are (1) securing indemnification from the G2 defendants or (2) being able to rely on the arguments made by the other defendants.

In summary, I respectfully request the following relief from the Court:

1. A declaration that I be allowed to join and incorporate by reference the G2 and Morley Memorandum and the Remaining Defendants' Memorandum in support of the Prayer for Relief set forth in my Answer; or
2. In the alternative, an extension until October 31, 2021 to file a memorandum of law in support of a motion to dismiss.

I believe that this relief is appropriate and necessary given the limitations I face as a Pro Se Defendant. Additionally, I believe that, to the extent the arguments I would set forth in any memorandum would be consistent with those already set forth by the other defendants, such relief would serve the Court's interest in the efficient review of the matters before it.


I thank you for your consideration of the foregoing.

Respectfully submitted,

/s/ Dori Karjian, Pro Se Defendant

To the extent relevant to the defendant and to the extent his participation is not barred by the Federal Rules of Civil Procedure, the defendant shall be deemed to have joined in his co-defendants' motions to dismiss filed on August 30, 2021.

Dated: August 31, 2021

  
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DENISE COTE  
United States District Judge